UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE



ASHLEY ADAMS
716 N Barrett Lane
Christiana, DE 19702
Mailing address:
PO Box 7652
Newark, DE 19714

PLAINTIFF

v

JO ELLEN SHELDON 708 Pebble Beach Drive Elkton, MD 21921

DEFENDANT

TO: The United States District Court
For the District of Delaware
The Honorable Judge Joseph J Farnan, Jr
844 N King Street
Lock Box 44
Wilmington, DE 19801

DISTRICT COURT

No. 04-251 JJF

MOTION TO COMPEL ANSWERS TO INTERROGATORIES and MOTION FOR SANCTIONS

On November 27, 2006, the first set of Interrogatories where mailed to the Defendant.

On January 4, 2007, Defendant's Attorney, Beth Christman initiated a telephone call to Plaintiff to discuss the answers to these Interrogatories, stating that Beth Christman, would in fact file a motion with the Court, because she was refusing to provide the answers to the Interrogatories.

To this date, January 26, 2007, Plaintiff, is not aware of any filing of any Motion by Defendant.

Plaintiff has given more than ample time for the required Interrogatory responses, now over 60 days from Defendant's receipt.

Plaintiff requests Sanctions against Defendant for failure to file timely responses to the request for Interrogatory answers.

Defendant is purposely avoiding answering the Interrogatories, to delay, cause hardship on pro-se Plaintiff, clearly to take advantage of that position, by refusing to provide the Answers to the Interrogatories, in so much, Defendant never filed such Motion to the Court as stated by Defendant on January 04, 2007.

Wherefore, Plaintiff, Ashley Adams, requests the Court to apply such Sanctions to be appropriate for refusing to answer the Interrogatories, and order the Defendant to immediately respond with the Answers to the Interrogatories.

Ashley Adams, Pro Se Plaintiff

PO Box 7652 Newark, DE 19714

302-393-3525

Dated January 26, 2007

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NOTICE OF SERVICE

I hereby give notice that I caused two (2) true and correct copies of the foregoing Motion to Compel Answers to Interrogatories and Motion for Sanctions to be served upon the following on the date set forth below, via first class mail, postage prepaid:

Beth H Christman CASARINO, CHRISTMAN, & SHALK, P.A. 800 N King Street, Suite 200 P.O. Box 1276 Wilmington, DE 19899 Attorney for Defendant

> Ashley Adams PO Box 7652 Newark, DE 19714 Plaintiff, pro se

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DEFENDANT

ORDER

Motion to Compel Answers to Interrogatories and Motion for Sanctions are						
hereby ordered, this day, o	f	, 2007.				
		_	Judge			

Asnley Adams PO Box 7652 Newark, DE 19714

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